

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

No.: 04-CV-10501 (PBS)

PLAINTIFFS' NOTICE OF DEPOSITION
OF DEFENDANT DEXIA BANK BELGIUM PURSUANT TO
FEDERAL RULES OF CIVIL PROCEDURE 30(a) AND 30(b)(6)

TO: Jeff E. Butler, Esq. (Jeff.Butler@CliffordChance.com) Clifford Chance US LLP 31 West 52 nd Street New York, New York 10019	Peter M. Saporoff, Esq. (PSaporoff@mintz.com) Mintz, Levin, Cohn, Ferris, Glovsky and Popeo P.C. One Financial Center Boston, Massachusetts 02111
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PLEASE TAKE NOTICE that, pursuant to Rules 30(a) and 30(b)(6) of the Federal Rules of Civil Procedure, plaintiffs in the above-captioned actions, by their undersigned counsel, will take the deposition upon oral examination at the date, time and place indicated below before a notary public or other person authorized to administer oaths. The deposition will be recorded by stenographic and sound and visual (videotape) means and will continue from day to day after the date of commencement until completion. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Deponent	Location	Date and Time
Dexia Bank Belgium	Dal & Veldekens Dageraadstraat 18 1000 Brussels	October 4, 2005 at 10:00 a.m.

In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deponent is advised of its duty to designate one or more of its officers, directors, managing agents or other persons to testify on its behalf with respect to the following categories as they relate to the period January 1996 through and including the present (the "Relevant Period"):

1. The search conducted for documents¹ responsive to Lead Plaintiffs' First Request for Production of Documents to Dexia Bank Belgium, dated April 6, 2005 including:
 - a. How the search for documents was conducted, including whose files were searched and the procedure(s) used to conduct the search, including what search terms were used to locate responsive electronic documents;
 - b. The locations which were searched, including but not limited to the physical location(s) where any hard-copy documents were housed or stored, the physical location(s) where any computers were housed or stored, the location of any electronic servers that were searched, and the computer routing/computer storage location of any electronic documents that were searched;
 - c. The method utilized for contacting current and former Dexia² employees, officers and directors that may have possessed responsive documents;

¹ "Documents" includes electronically stored data and information, including e-mail and voice mail.

² As used herein, "Dexia" includes Dexia Bank Belgium and any of its present or former branches, divisions, subsidiaries, affiliates, and predecessors (including, without limitation Artesia Banking Corp., S.A. and any of its branches, divisions, subsidiaries, affiliates and predecessors), and the current and former officers, directors, employees, servants, and agents of any of the foregoing entities.

- d. Any and all communications with the Belgian prosecutor, the Belgian prosecutors' office, or the Investigating Magistrate in Belgium regarding Dexia Bank Belgium, or any former officer, director, or employee thereof, requesting and/or obtaining copies of any documents, whether originals or copies, in the possession of the prosecutor as a result of or arising out of the prosecution's investigation of L&H³ and/or Dexia's activities with regard to L&H, and any efforts to obtain any such documents from the Belgian prosecutor, the Belgian prosecutors' office, or the Investigating Magistrate in Belgium;
- e. The method utilized for searching any computer systems used by or at Dexia during the Relevant Period, including all e-mail and voicemail systems and all fault tolerance and disaster recovery systems; and
- f. Any efforts made to determine if responsive documents have been destroyed, the timing and circumstances surrounding their destruction, and any efforts to recover such documents.

³ "L&H" means Lernout & Hauspie Speech Products, N.V. a Belgian corporation that had its European principal executive offices in Ieper, Belgium and its United States principal executive offices in Burlington, Massachusetts, and includes any of its predecessors, successors, parents, subsidiaries, divisions or affiliates (including, without limitation, L&H Holdings, USA, Inc., Kurzweil, L&H Korea, Dictation Corporation and L&H Asia Pte), and their officers, directors, agents, attorneys, accountants, employees, partners, or other persons occupying similar positions or performing similar functions (including, without limitation, Jozef Lernout, Pol Hauspie, Carl Dammekens, Nico Willaert, and Gaston Bastiaens).

2. Dexia's document organization, preservation, and retention policies and practices with respect to all services provided to L&H and all related persons and entities,⁴ L&H's officers and directors, including but not limited to Pol Hauspie, Jo Lernout, Nico Willaert, and Gaston Bastiens, and subsidiaries, etc., including, without limitation:
 - a. Organizational structure of credit files, credit report files, credit committee files, correspondence files, client files, internal control/internal audit files, general files, due diligence files, and other files maintained by Dexia.
 - b. Identification and description of media of stored or retained documents, whether electronic, hard-copy, or other and whether original or duplicate copies of such materials are retained as a matter of practice and/or policy;
 - c. Document retention and destruction policies, both internal and any required by statute, regulation or convention.

⁴ As used herein, "related person and entities" includes all Language Development Companies, Cross-Language Development Companies and Intelligent Agent Companies that purported to do business with L&H such as Lupeni Pte Ltd., Jelgava Pte Ltd., Harrisca Pte Ltd., Salfas Pte Ltd., Senegal Pte Ltd., Baleston Pie Ltd., Duranzo Pie Ltd., the Bahassa Development Company, the Slavic Development Company, the Farsi Development Company, the Greek Development Company, the Hungarian Development Company, the Polish Development Company, the Czech Development Company, the Thai Development Company, the Tamil Development Company, the Hindi Development Company, the Turkish Development Company, Shangra Pte Ltd. (Vietnamese), Vanesto Pte Ltd. (Urdu), Vaciena Pte Ltd. (Malay), Rodeon Pte Ltd. (Taiwanese), Capital Union (Arabic and Arabic Dialects), Lavenia (Armenian), I-MERGE, I-MAIL (Potosi), I-NEWS (Nuwara), I-OFFICE (Hamchat), I-MEDICAL (Shinelis), or I-TRAVEL (Sherily) and their predecessors, successors, parents, subsidiaries, divisions or affiliates, and their officers, directors, agents, attorneys, accountants, employees, partners, or other persons occupying similar positions or performing similar functions, as well as Flanders Language Valley Fund, c.v.a., FLV Fund Management, FLV Management USA, Lernout & Hauspie Investment Company, FLV Foundation a/k/a SAIL Trust, Dictation Consortium N.V., Brussels Translation Group N.V., Radial Belgium N.V., Language Investment Co., Language Development Fund and Mercator and Noordstar NV (also known as Mercator Assurances, S.A.).

Dated: September ~~14~~th, 2005

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/s/ Glen DeValerio

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Trustees of the TRA Rights Trust**

Certificate of Service

I hereby certify that on September 14, 2005, I caused a true copy of the foregoing *Plaintiffs' Notice of Depositions of Defendant Dexia Bank Belgium Pursuant to Federal Rules of Civil Procedure 30(a) and 30(b)(6)* dated September 14, 2005 to be served by electronic mail and First Class Mail, postage prepaid, upon the following Counsel of Record at the electronic and postal addresses indicated below:

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Quaak v. Dexia, S.A., C.A. No. 03-11566-PBS; *Baker v. Dexia, S.A.*, C.A. No. 04-
10501-PBS, *Stonington Partners, Inc v. Dexia, S.A.*, C.A. No. 04-10111-PBS**

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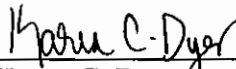
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Karen C. Dyer